

# KING & SPALDING

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July 31, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. On July 21, 2015, the plaintiff in *Pillars v. General Motors LLC*, Case No. 1:15-cv-11360-TLL-PTM (E.D. Mi.) (“**Pillars Lawsuit**”), which is pending in the United States District Court for the Eastern District of Michigan (“**Michigan District Court**”), filed a response (“**Pillars Response**”) to *Defendant General Motors LLC’s Motion For Leave To File Amended Notice Of Removal And Amended Answer* (“**Motion to Amend**”).<sup>1</sup> On July 23, 2015, New GM filed its reply to the Pillars Response with the Michigan District Court (“**New GM Reply**”).<sup>2</sup> On July 30, 2015, the plaintiff filed a *Motion to Supplement Plaintiff’s Response to Defendant’s Motion for Leave to File Amended Notice of Removal and*

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<sup>1</sup> A copy of the Motion to Amend was attached to New GM’s letter to the Court dated July 20, 2015 [Dkt. No. 13308].

<sup>2</sup> A copy of the Pillars Response and the New GM Reply were attached to New GM’s letter to the Court dated July 24, 2015 [Dkt. No. 13320].

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*Amended Answer* (“**Pillars Supplemental Response**”), and New GM filed a reply to Pillars Supplemental Response later that same day. Copies of the pleadings filed on July 30, 2015, are annexed hereto as **Exhibits “1”** and **“2”** respectively.

2. On July 28, 2015, the Groman Plaintiffs filed with the Second Circuit a motion to intervene in the appeals of the Judgment. A copy of the motion is attached hereto as **Exhibit “3”**.
3. On July 30, 2015, the States of California and Arizona filed their *Reply In Support of Motion to Withdraw the Reference with Regard to No Strike Pleadings Filed by the States of California and Arizona*, and the Ignition Switch Plaintiffs filed their *Reply in Support of Motion to Withdraw the Reference for the Ignition Switch Plaintiffs’ No Strike Pleading with Regard to the Second Amended Consolidated Complaint; and the Non-Ignition Switch Plaintiffs’ (I) Objection Pleading with Regard to the Second Amended Consolidated Complaint and (II) GUC Trust Asset Pleading*, in the District Court. Copies of these two pleadings filed on July 30, 2015, are annexed hereto as **Exhibits “4”** and **“5”** respectively.
4. Today, July 31, 2015, counsel for New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,<sup>3</sup> is attached hereto as **Exhibit “6”**.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

AJS/sd  
Encl.

cc: Edward S. Weisfelner  
Howard Steel  
Sander L. Esserman  
Jonathan L. Flaxer  
S. Preston Ricardo  
Matthew J. Williams  
Lisa H. Rubin

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<sup>3</sup> There are 26 exhibits annexed to the Update Letter, most of which are documents that have previously been filed with this Court; the other documents are either attached as exhibits to this letter, or do not appear relevant to this bankruptcy case. To the extent the Court believes any other exhibits should be filed, New GM will do so promptly.

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